DOCUMENT RESUME

ED 211 858 CE 031 287

AUTHOR Greenwood, Katy; And Others
TITLE An Assessment of Supplemental Vocational Education Assistance in Texas. Title II, Section 204, Comprehensive Employment and Training Amendments of 1978 (P. L. 94-524).
INSTITUTION Texas A and M Univ., College Station. Texas Engineering Experiment Station.
SPONS AGENCY Texas State Dept. of Community Affairs, Austin.
PUB DATE 1 May 81
NOTE 86p.; For related documents see CE 031 283-288.

EDRS PRICE MF01/PC04 Plus Postage.
DESCRIPTORS Administrator Attitudes; Coordination; Educational Cooperation; Educational Finance; Educational Policy; Employment Programs; Federal Aid; Federal Legislation; Federal Programs; *Financial Support; *Job Training; Linking Agents; Literature Reviews; National Surveys; Program Descriptions; Program Evaluation; *Program Implementation; Scheduling; *State Programs; Statewide Planning; *Vocational Education
IDENTIFIERS *Comprehensive Employment and Training Act; Department of Labor; *Education for Work Linkage Project; Texas

ABSTRACT

This report describes the ways in which the funds for supplemental vocational assistance provided by Title II, Part A, section 204 of the Comprehensive Employment and Training Act (CETA) amendments of 1978 have been used to provide services for eligible CETA participants in Texas. Outlined first are the climate and the background of CETA/education coordination and linkages. The intent and regulations pertaining to Title II, section 204 are explained. Reviewed next are previous studies on CETA/vocational education coordination. A framework is provided for assessing section 204 in Texas. In a discussion of the status of section 204 in Texas the following areas are covered: non-financial agreements, prime sponsor attitudes, and current and potential program/service deliverer attitudes. A national survey of state 204 programs is summarized, with particular attention to distribution and allocation of 204 funds, types and levels of education programs using 204 funds, scheduling patterns of 204 programs, monitoring/assessment of 204 programs, and significant aspects of individual programs. Conclusions and recommendations are made concerning legislative provisions, assumptions underlying section 204, communicating the opportunities of section 204, and attitudes concerning the section. (Other Education for Work Linkage Project reports are available separately--see note.) (MN)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED211858

AN ASSESSMENT OF SUPPLEMENTAL VOCATIONAL EDUCATION ASSISTANCE IN TEXAS

Title II, Section 204
Comprehensive Employment and Training Amendments
of 1978 (P. L. 94-524)

By

Katy Greenwood
Project Director

John Skinkle
Gonzalo Garcia, Jr.
Project Staff

The Education-for-Work Linkage Project
Texas Engineering Experiment Station
and Texas A&M University
College Station, Texas

CE 031 287

U.S. DEPARTMENT OF EDUCATION
NATIONAL INSTITUTE OF EDUCATION
EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)

✓ This document has been reproduced as received from the person or organization originating it.

☐ Minor changes have been made to improve reproduction quality.

• Points of view or opinions stated in this document do not necessarily represent official NIE position or policy.

May 1, 1981

"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

K. Greenwood

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

This assessment was conducted as part of the Education-for-Work Linkage Project pursuant to an inter-agency agreement between the Texas Department of Community Affairs and Texas Engineering Experiment Station. Points of view or opinions included in this product do not necessarily represent the official position, policy, or views of the Texas Department of Community Affairs, Division of Manpower Services.

PREFACE

The Education-for-Work Linkage Project, sponsored by the Texas Department of Community Affairs, in cooperation with Texas Engineering Experiment Station and Texas A&M University, College of Education, has an overall goal of studying and strengthening potential and actual linkages between the various job training systems in Texas, as well as between job training systems and the private sector. Four purposes underly all products of the project:

1. Develop a statewide information base for vocational education services provided in Texas;
2. Create an information exchange network for program delivery agents;
3. Provide technical assistance and training to persons involved in vocational education services
4. Provide policy research and program evaluation documents focusing on critical issues and concerns of the vocational education community.

The report contained in this document describes the ways in which the funds for Supplemental Vocational Education Assistance provided by Title II, Part A, Section 204 of the Comprehensive Employment and Training Act (CETA) Amendments of 1978 (P. L. 95-524) have been used to provide services for eligible CETA participants in Texas. Section 204 of the CETA amendments represents one of the several CETA mandated linkage strategies designed to facilitate inter-agency cooperation in order to better serve the populations eligible for CETA services.

This report includes a review of the overall purpose of federal provisions for education-for-work programs, a description of the mandated

linkage requirements between CETA and vocational education, a review of previous studies on Supplemental Vocational Education Assistance, a review of how states other than Texas have implemented Section 204, and a description of how those particular funds have been used in Texas. Finally, recommendations are included for improving the administration and implementation of Section 204 in Texas during FY 1982.

The intent of this report is to bring fuller understanding about Section 204 to education-for-work policymakers and program implementers, not only about the opportunity inherent in the linkage strategy, but also regarding the status of its performance at the present time in Texas. It is hoped that the report will contribute toward an improved delivery of education-for-work programs for the citizens of Texas.

ACKNOWLEDGEMENTS

The Education-for-Work project staff is appreciative of the courtesy and cooperation that has been extended by the state-level personnel responsible for administering Title II, Section 204 of CETA. At the Texas Education Agency, Mr. Robert Caster, Mr. Luther Thompson, and Mr. James Woodman have provided all information requested in an expedient and courteous manner. They have openly and candidly discussed their own concerns about the difficulty of the legislative provisions of this mandated linkage and have expressed interest and commitment toward continually trying to identify better or more efficient ways to make this part of CETA more responsive to client needs.

In addition, the personnel from the Texas Department of Community Affairs, Mr. L. C. Harris III, Mr. Armando Diaz, and Ms. Robin Roberts, responsible for allocating resources for Section 204, have identified their concerns about how their role in administering this part of CETA could be improved or modified.

Many groups of personnel who have played a part in the delivery of Section 204 in Texas have been contacted by telephone or on-site visits to survey their impressions and feelings about 204. On behalf of the project staff, I want to thank these persons for participating and cooperating. Without exception, these people have given their candid assessment of how 204 is currently utilized for meeting the needs of eligible CETA clients in Texas.

Several of the Education-for-Work project staff members have played a part in completing an assessment of the Title II, Section 204 activities.

Dr. John Skinkle has had overall project responsibility for the conceptualization and approach to the assessment. Dr. Skinkle was assisted periodically by Dr. Gonzalo Garcia and Dr. David Gill. Assisting with on-site visits and telephone interviews were Dr. Karin Stork-Whitson, Mr. Russell Kitchner, Mr. John Warminski, Mr. John Harnsberry, Ms. Ava Hardesty, Mr. Bill Banks, Mr. Louis Jeffries, and Ms. Linda Halter. Mary Burns, project librarian, assisted in contacting other states about their approach to the Title II, Section 204 program and in providing useful resources for project staff for conceptualizing the report. Project secretaries who typed the report included Sandy Patterson and Suzanne Schmidt.

Katy Greenwood, Ph.D.
Project Director
Education-for-Work Linkage Project

TABLE OF CONTENTS

		Page
PART I:	OVERVIEW AND BACKGROUND OF FEDERAL PROVISIONS FOR EDUCATION-FOR-WORK	1
	Recent Programmatic History	1
	Department of Labor Provisions and the Issue of Coordination	3
	CETA Amended to Assure Coordination and Linkage with Education	7
	Status of Linkage Between CETA and Vocational Education in 1981	10
	Organization of This Report	13
PART II:	SUPPLEMENTAL VOCATIONAL EDUCATION ASSISTANCE	14
	Comprehensive Employment and Training Act (1973)--Title I, Section 112	15
	Title I, Section 112 as Implemented in Texas	17
	Comprehensive Employment and Training Amendments of 1978--Title II, Part A, Section 204 (P. L. 94-524)	19
	Provisions of Title II	19
	Section 204	21
	Purpose	21
	Legislative provisions	21
	Rules and regulations	22
	Summary of Section 204	24
	Title II, Part A, Section 204 as Implemented in Texas	25
	Organizational Structure	25
	Non-Financial Agreements	26
	Allowable Services	28

TABLE OF CONTENTS (continued)

		Page
PART III:	REVIEW OF PREVIOUS STUDIES ON CETA/ VOCATIONAL EDUCATION COORDINATION	31
PART IV:	FRAMEWORK FOR ASSESSING SECTION 204 IN TEXAS.	35
	Purpose of Assessing Section 204 in Texas. . . .	36
	Conduct of the Assessment.	37
	Significance of the Assessment	38
	Problems of the Assessment	38
PART V:	STATUS OF THE SECTION 204 PROGRAM IN TEXAS.	40
	Non-Financial Agreements	40
	Survey of Prime Sponsors	44
	Survey of Program/Service Deliverers	51
	Impact of 204 funds on service provider's system.	52
	Impact of 204 on remaining programs	52
	Knowledge of 204 funded programs.	53
	Perceived problems with Section 204 programs	53
	Suggestions for improving the use of 204 funds	53
	Survey of Potential Program/Service Deliverers	55
PART VI:	NATIONAL SURVEY OF STATE 204 VOCATIONAL PROGRAMS. . .	58
	Distribution and Allocation of 204 Funds	58
	Types and Levels of Educational Programs Using 204 Funds.	60
	The Scheduling Patterns of 204 Programs.	61
	Monitoring/Assessment of 204 Programs.	61

TABLE OF CONTENTS (continued)

Page

Significant Aspects of the 204 Programs. 62

Comments and Recommendations of Other States Regarding Section 204 63

- Funding 63
- Administration. 64
- Program planning. 64
- Coordination between CETA prime sponsors and state boards of vocational education. 64

PART VII: CONCLUSIONS AND RECOMMENDATIONS 65

Legislative Provisions 65

Assumptions Underlying Section 204 67

Communicating the Opportunities of Section 204. 68

Attitudes Concerning Section 204 69

REFERENCES 70

APPENDIX A 72

LIST OF TABLES

Table		Page
1	Distribution of Funds Allocated Under CETA Title II, Section 204 for Supplemental Vocational Education Assistance	23
2	Summary of Research Studies on CETA/Vocational Education Coordination	33
3	Fiscal Obligations for Section 204--FY 1981	41
4	Number and Percent of Prime Sponsors Who Reported Participation in Cooperative Skill Training Programs Funded Under Section 204.	43

LIST OF FIGURES

Figure		Page
1	Organization for Distribution of Section 112 (5% Funds) in Texas	16
2	Organization for Distribution of Section 204 (6% Funds) in Texas	27

PART I: OVERVIEW AND BACKGROUND OF FEDERAL PROVISIONS FOR EDUCATION-FOR-WORK

Federal concerns for employment and training have roots that extend as far back as the Second Continental Congress in 1787 where legislative debates first focused on the role of the federal government in fostering a practical and useful education for the people. That role, although hotly debated in the early formative years of this country, and no less debated in the 1980s, has increased steadily. Periodically, the federal involvement has been in the form of fostering and initiating educational programs for job training which could be delivered through the existing public school systems; at other times, the federal involvement has taken the direction of utilizing city and county governance structures to implement employment and training programs.

Recent Programmatic History

Federal outlays for job training have increased steadily since 1960; expenditures have risen from approximately $250 million in 1961 to over $10 billion in 1980. This twenty-year span has witnessed a number of federal initiatives and reforms designed to enhance the capability of the nation's citizens to become economically self-sufficient through work roles in the society.

Even though the federally funded Smith-Hughes Act, passed in 1917 and which remained structurally unchanged until 1963, had established job training as part of the public education delivery system in each

State, popular demands created alternative systems. Under the pressure of more and more emphasis on job training for special populations, four federal statutes related to job training were passed by Congress in the 1960s: (1) the Manpower Development and Training Act (MDTA) of 1962; (2) the Vocational Education Act (VEA) of 1963; (3) the Economic Opportunity Act (EOA) of 1964; and (4) the Appalachian Redevelopment Act (ARA) of 1965. Only the VEA of 1963 was administered by the federal education agency--HEW; with the exception of VEA, all focused primarily on the economically and socially disadvantaged; all stressed on-the-job training and work experience over classroom instruction; and all placed high priority on short duration enrollments. (Wilkins and Brown III, 1981)

Davidson (1972) points out that the growing competition for sponsorship and subsequent control of education-for-work programs was prompted by various coalitions in the 1960s. The Department of Labor (DOL) tended to reflect the concerns of mayors, governors, employment security agencies, and labor unions. Another coalition, closely aligned with the Office of Economic Opportunity (OEO), worked primarily on behalf of local anti-poverty organizations and minority groups. The third coalition, working through the Department of Health, Education, and Welfare (HEW), focused mainly on the concerns of the vocational education community and state and local education agencies.

According to Davidson (1972), Congress opted to split control of job training programs among the three agencies which spoke for their interests in Washington. The "spoils" were divided according to the

political strength of each group. The DOL received the most, OEO came off second best; and HEW placed a distant third. Congress recognized, however, that none of these agencies were in a position to mobilize or organize all of the resources that might be needed by many of the program participants, and thus attempted to compensate by enacting a wide range of mandates for interagency coordination.

By the early 1970s, the bulk of federal involvement in job training was administered in two federal agencies: The Department of Labor (DOL) and the Department of Health, Education, and Welfare (DHEW). By encompassing the concepts and ideals represented by the Office of Economic Opportunity, the Department of Labor had become an agency with a budget for job training at least ten times that of the vocational education agency within the Department of Health, Education, and Welfare. These two agencies held somewhat the same goals, but with different approaches to job training. The Congressional requirements for linkage and coordination between the two have not subsided; instead the mandated linkages and coordination coupled with the need for collaborative planning have become the criteria against which both agencies are being evaluated in the early 1980s.

Department of Labor Provisions and the Issue of Coordination

Since the 1960s, the Department of Labor has sponsored various strategies for meeting the needs of unemployed and economically disadvantaged persons. Many of these strategies have been designed to involve the federally funded vocational education programs that are implemented through state departments of education in the various states.

In 1961 the Area Redevelopment Act was passed for the purpose of stimulating economic growth and developing long-term job opportunities in areas that were experiencing high unemployment. Cooperative efforts of the Department of Labor and the Department of Health, Education, and Welfare provided classroom training for unemployed adults for a period not to exceed sixteen weeks.

In 1962, the Manpower Development and Training Act (MDTA) was passed to retrain unemployed heads of households who were technologically displaced. The program began with an emphasis on institutionalized training and on-the-job training and was amended to include youth programs, basic education, older workers programs, and programs for the "hardcore" unemployed. Early MDTA programs were administered by the Employment Services Division of DOL and the DHEW through state departments of vocational education.

In 1964 Congress declared a "war on poverty" by passing the Economic Opportunity Act (EOA) which authorized various categorical programs. These programs served clients based on their categorized characteristics and needs and included, among others, the Neighborhood Youth Corp for in-school youth. It also included the Concentrated Employment Program (CEP) which blended EOA and MDTA funds to provide comprehensive manpower programs in specific geographical areas.

The Emergency Employment Act (EEA) passed in 1971 authorized a Public Employment Program (PEP) to create jobs to fill public sector needs and to provide jobs for unemployed and underemployed, not just the economically disadvantaged.

In 1973 the Comprehensive Employment and Training Act (CETA) was signed into law. Authorizing legislation for MDTA, EOA, and EEA either expired or was repealed with the passage of the CETA legislation. CETA represented an effort by the Department of Labor to consolidate its programs. It was also the result of much criticism concerning the coordination mandates of pre-CETA legislation. As Davidson (1972) pointed out, the coordination mandates prior to CETA possibly failed for three reasons. First, the administration of all programs was so centralized in Washington that federal officials had little real basis for knowing what specific types of coordination were really needed at the state and local levels. Second, funds were distributed through so many specialized programs and contracts that the total system was virtually incomprehensible. And third, programmatic fragmentation was self-perpetuating. As each competing group gained new resources, turf battles multiplied.

Davidson also suggests that of all the interest groups that had an important role in manpower services, education was the only one that did not fully assert itself in the reorganization of employment and training programs through the CETA enactment in 1973. Davidson noted that the educational establishment, primarily state and local education agencies, paid dearly for their complacency. Prior to CETA, they had a statutory monopoly over the provision of all vocational education services required under MDTA. With the enactment of CETA, job training agencies were exempted from having to comply with any education standards established by the state.

CETA, in 1973, was not required to give more preference to vocational education than to any other job training program, private or public. Its goal was to coordinate all manpower services through state-local administrative leadership and through flexibility in program delivery. Several provisions were included, however, to facilitiate coordination and linkage between vocational education and the CETA programs. These included:

- a 5 percent set-aside of Title I funding to assist state vocational education agencies "to provide needed vocational education services in areas served by prime sponsors (CETA 1973, sec. 11 (a));"
- a 4 percent set-aside of Title I funding to assist governors in developing comprehensive manpower plans which "provide for the cooperation and participation of all state agencies providing manpower and manpower-related services (CETA 1973, sec. 196 (b) (3));"
- a requirement holding all prime sponsors responsible for utilizing state vocational education agencies, local schools, and postsecondary educational institutions "after giving due consideration to the effectiveness of such services and facilities (CETA 1973, Sec. 105 (a) (3) (B));"
- a reciprocal exchange of representation between the State Manpower Services Council (SMSC) and the State Advisory Council on Vocational Education (SACVE)
- mutual review of annual state plans by the SMSC and the SACVE (CETA 1972, sec. 107); and
- inclusion of education interests on each prime sponsor's planning council, where appropriate (CETA 1973, sec 104).

However, the education community saw these particular linkages as proforma exercises. While state vocational education agencies were permitted to distribute 5 percent of Title I funds, they were not

permitted the right to control the use of funds by their grantees. Without mandated use of the public schools, prime sponsors seemed to use them less and less. School officials found themselves having less and less involvement in the local CETA program even though their presence on the CETA planning councils was encouraged by law.

CETA Amended to Assure Coordination and Linkage with Education

Responding to concerns and criticisms of the educational community and recognizing that cooperation by educational institutions was necessary for the success of CETA, Congress amended CETA in 1977, and again in 1978 to assure better coordination and linkage. New and innovative strategies for linking CETA were enacted; other provisions actually guaranteed educational institutions greater access to CETA resources through set-asides.

In 1977, the Youth Employment Act of 1977 (P. L. 95-93) was passed as an amendment to CETA. This authorization was intended to provide a coordinated approach between CETA and vocational education to meet the needs of youth. The legislation specifies:

> "It is the purpose of this Title to provide a broad range of coordinated employment and training programs for eligible youth in order to provide effectively for comprehensive employment and training services to improve their future employability and to explore and experiment with alternate methods for accomplishing such an effort."

The three sub-parts of P. L. 95-93 provide alternative strategies for CETA prime sponsors, governors, and the Secretary of DOL to initiate services to youth, primarily through linkage arrangements with education.

Subpart I, the Youth Incentive Entitlement Pilot Projects (YIEPP), provides for demonstration projects to test whether jobs can feasibly be guaranteed for 16-19 year olds who are in school, or will return to school, and whether the jobs will increase high school retention, return and completion. This program provides seventeen pilot projects nationwide which can demonstrate linkage programs on behalf of youth.

Subpart 2, the Youth Community Conservation and Improvement Projects (YCCIP), is administered by Prime Sponsors to employ 16-19 year olds in well supervised settings to tangibly benefit the local community. The youth can be employed by public schools as well as other public agencies.

Subpart 3, the Youth Employment and Training Program (YETP), provides a variety of programs and services at the local level and for some statewide efforts funded through the Governor. The goal is to establish programs designed to make a significant long term impact on the structural unemployment problems of youth. From these funds, the Secretary of Labor may utilize 20% for national projects, the Governor of each state may utilize 5% for state-wide youth services, and the prime sponsors may utilize 75% for employment and training programs. Out of the 75% fund for prime sponsors, 22% of the allocation to prime sponsors must be used in linkage agreements with local educational agencies.

Wilkin and Brown III (1981) point out that the main burden for education linkages falls on local prime sponsors in the above enactment.

Unlike any other CETA program, local sponsors must use at least 22 percent of all revenues derived from YETP for cooperative service agreements with public schools. Furthermore, all local sponsors must assure that any YETP work experience program for in-school youth will:

- supply jobs which are relevant to the participants' educational and career goals;
- inform participants about other training resources such as vocational education; and,
- receive the approval of the local youth council, an advisory body which, by case, must grant representation to education interests.

The YETP legislation set a precedent that was followed in 1978, when Congress again amended CETA. Under pressure from the educational community, Congress in 1978 increased CETA's vocational education set-aside from 5 percent of old Title I to 6 percent of the funding under Parts A, B, and C of new Title II (CETA 1979, sec. 202 (a) (1) (C) (d)). Additionally, it created a new set-aside which gives governors 1 percent of Title II (Parts A, B, C, D) funding for "encouraging coordination and establishing linkages between prime sponsors and appropriate educational agencies" (CETA 1979, sec. 202 (a) (1) (D) (d)).

As a result of the youth amendments of 1977 and 1978, the value of CETA's mandated educational set-asides rose in just two years from $94 to $269 million or almost 300 percent. Thus in fiscal year 1980, CETA's mandated financial set-asides for educational agencies and institutions were visible in Title II, and in Title IV, as follows:

1. Title II -- Comprehensive Employment and Training Services

   Parts A, B, C -- Services, Upgrading and Retraining

   - Budget Authority: $2,054 million
   - Mandated Education Set-Asides
     (1) Governors' grants for vocational education: 6 percent of funds available or $123 million.
     (2) Governor's grants for prime sponsor-education linkages: 1 percent of funds available under Parts A, B, C, and D (see below), or $35 million.

2. Title IV -- Youth Programs

   Part A -- Youth Employment Demonstration Programs

   - Budget Authority: $826 million
   - Mandated Educational Set-Aside: $114 million
     Comment: Set-aside equals a minimum of 22 percent of sums available to local prime sponsors under YETP

Status of Linkage Between CETA and Vocational Education in 1981

Few studies have been conducted on the recently expanded linkages, and none seem to be available on the quality of services provided to eligible CETA clients as a result of the linkages with educational institutions. Too little time has passed since the CETA amendments (designed to foster coordination and linkage) were passed to have conclusive evidence of the value of such linkages. A recent Department of Education report (Wilkin and Brown III, 1981) states that there is growing evidence that supports three conclusions regarding the current status of linkage between CETA and education:

- CETA agencies and educational institutions are moving rapidly toward a form of administrative detente; administrative linkages between the two "camps" have expanded in many cases well beyond the minimum required by law.

- Improved administrative linkages have not translated into a significant restructuring of education and manpower service delivery systems; thus far, most educational institutions have treated CETA programs as "add-ons" which are not integrated within their basic operating structure. Similarly, many CETA agencies have not treated educational institutions as equal partners, but as hired hands.

- While there is reason to believe that administrative relations between CETA programs and educational institutions will improve, it is difficult to imagine that either side will be able or inclined to support widespread integration of their service delivery systems without significant revisions in current federal legislation (pp 15-16).

This report also noted that the most tangible measure of administrative detente is the increasing magnitude of fiscal linkages between CETA agencies and educational institutions. In 1974, economic ties between CETA agencies and educational institutions totaled less than $400 million. Today, economic transactions between CETA agencies and educational institutions total between $1.1 and $1.5 billion.

Even though there has been a greatly expanded economic benefit to education, there has been little progress toward actual integration of service activities. Other descriptors of the current scenario indicate a lack of progress toward linkage. There has been little, if any, mutual funding of CETA-school activities; prime sponsors are looking more to community-based organizations or other contractors, rather than

the schools, for instruction in basic educational skills. Also, the issue of academic credit for CETA work experiences has not been resolved, or hardly addressed in many states.

It is possible that the status of the mandated linkages in fiscal year 1981 would seem unimpressive due to several factors. First, there has been a relatively short time for the mandated linkages to have been implemented; neither CETA staff nor educational personnel have had technical assistance (in most states) with the intention and potential of the linkage strategies. Second, there are mandated coordination and linkage requirements of prime sponsors that act in conflict with each other. Prime sponsors are to give precedence to community-based organizations for services in parts of the CETA law; they are also to make sure they use the skill centers that were constructed under the old MDTA; and they are to utilize existing schools and educational institutions. These mandates for prime sponsors are bound to create conflict because all political contenders expect to receive their "fair share" of the CETA funds. Third, there are characteristics about both the educational system and its personnel, as well as the manpower system and its personnel, that coordination alone cannot mitigate. They have differing orientations, different goals, different timelines, and different priorities; also they are each evaluated against different sets of federal and/or state laws.

Organization of This Report

Part I of this report has included a review of the climate and the background of CETA/education coordination and linkages, particularly in relation to the Governors' set-aside for vocational education - Title II, Section 204.

Part II of the report will address the intent and regulations pertaining to Title II, Section 204. Part III will review previous research pertinent to this study. Part IV will review the procedures used to assess the utilization of Title II, Section 204; and Part V will report the findings from the information gathered by the project staff of the Education-for-Work Linkage project. Part VI will provide an analysis of how other states are implementing Section 204. Part VII will make recommendations for improving this linkage activity within the State of Texas.

PART II: SUPPLEMENTAL VOCATIONAL EDUCATION ASSISTANCE

As mentioned in Part I of this report, the CETA legislation included set-asides both in 1973, and again in the 1978 amendments, for Governors to utilize funds for supplemental vocational education assistance in co-operation with State Boards of Vocational Education. These set-asides were established to encourage the use of existing, local, vocational education programs in order to better serve the eligible CETA client.

Under both statutes, the purposes of CETA remained essentially the same. In each case, the legislation was designed to provide manpower services, education, training, and transitional employment for unemployed, underemployed, and economically disadvantaged people, age 16 and older. The primary focus of the legislation was to provide training and other assistance (i.e., supportive services and counseling) for the hardcore, long-term unemployed who fit the CETA criteria of economic, social, and cultural disadvantagement and who have the greatest need for the services CETA can provide. The ultimate goal of CETA programs is placement in full-time, permanent, unsubsidized employment.

This part of the report will review the supplemental vocational education assistance activities initiated under the 1973 CETA provisions, Title I, Section 112. In addition, the current regulations under the 1978 CETA amendments, Title II, Section 204, will be reviewed. A brief overview of both the Section 112 (1973) and 204 (1978) programs will provide an orientation to the substantive and organizational context within which an assessment of Section 204 was conducted.

Comprehensive Employment and Training Act (1973)-- Title I, Section 112

Under the specific provisions of the 1973 enactment, Title I, the primary manpower development title, was the only section of the law in which state departments of education were directly involved. Provisions of Title I included classroom training, on-the-job training, public service employment, and work experience. The classroom training was to be provided in an institutional setting, to an individual or group, with an emphasis on the development of occupational skills or basic skills. The classroom training provided was to be in an occupational area for which there was a high demand in the local labor market.

Under Section 112 of the CETA legislation, each state governor received a special grant to support the vocational education services of prime sponsors; each state received an amount equal to five percent of the total Title I funds. These monies were to be channeled through the State Boards for Vocational Education or the chief policymaking body for vocational education in each state. While other funds available through Title I went directly to the prime sponsor, Section 112 required prime sponsors to make non-financial agreements with the state education agency for the types of vocational education services needed in the area. The state education agency then paid, with Section 112 funds, local education agencies and community colleges to provide the services.

Typically, Section 112 funds were first received by the Governor's Office, which then transferred the funds to the State Board for Vocational Education or its representative, such as a state agency. The flow of funds for section 112 are shown in Figure 1 on the following page.

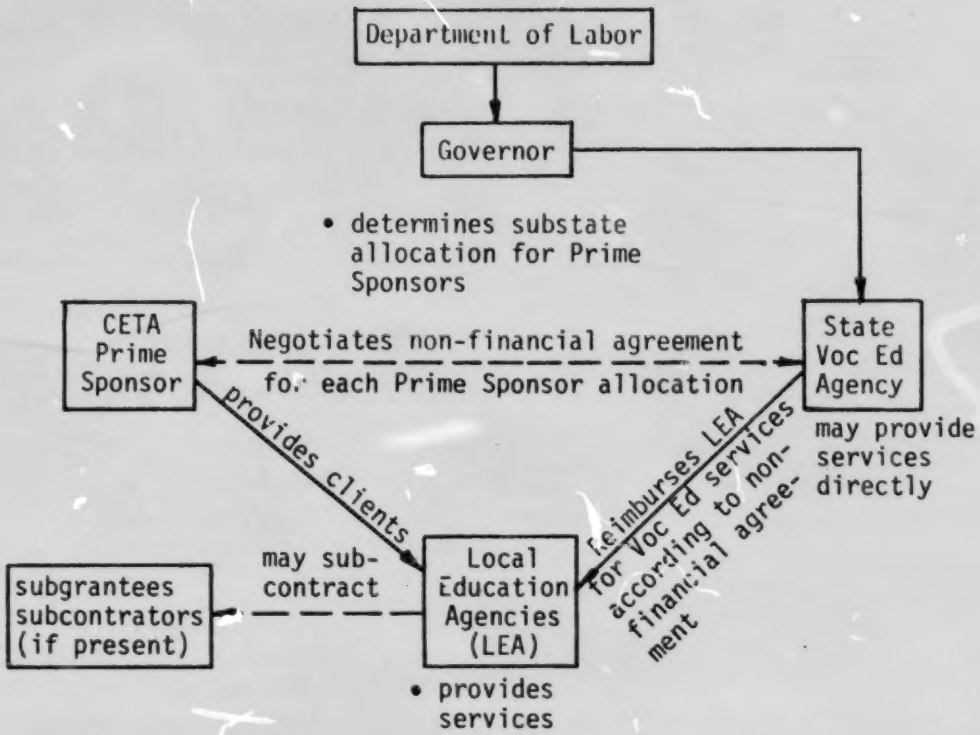
Department of Labor
Governor
• determines substate allocation for Prime Sponsors
CETA Prime Sponsor
Negotiates non-financial agreement for each Prime Sponsor allocation
State Voc Ed Agency
may provide services directly
provides clients
reimburses LEA for Voc Ed services according to non-financial agreement
may sub-contract
subgrantees subcontrators (if present)
Local Education Agencies (LEA)
• provides services

Figure 1: Organization for Distribution of Section 112 (5% funds) in Texas.*

Each prime sponsor was responsible for negotiating a non-financial agreement with the State Board for Vocational Education which specified both the kinds of services and the manner in which they would be provided. The fiscal resources available through Section 112 were perceived as one means of accomplishing a major Congressional objective when it passed the CETA legislation--to avoid duplication and overlap of employment-related programs and services. Over time, CETA prime sponsors established a continuous working relationship with local vocational education agencies as potential suppliers of programs and services in the area of classroom training.

---

*Figure appeared in "A Procedural Guide for Utilization of Title I, Section 112 Funds" (Texas Education Agency, 1977 - Revised)

Title I, Section 112 as Implemented in Texas*

In Texas, Section 112 funds were received by the Governor's Budget and Planning Office (GBPO), which then reimbursed the Texas Education Agency (TEA) on a monthly basis. Although the Division of Adult programs in TEA was responsible for administering the Supplemental Vocational Education program, the policies for administering Section 112 programs was set by the State Manpower Services Council (SMSC). This meant that staff from the Adult Programs Division and the Governor's Budget and Planning Office (GBPO) had to coordinate their efforts to make the program effective. At the local level, Adult Programs Division field staff offered technical assistance to prime sponsors and local education agencies to help them develop vocational education programs funded through Supplemental Vocational Education and other CETA programs.

A variety of mechanisms were used in Texas by the SMSC, GBPO, and the Adult Programs Division of TEA to promote coordination and effective implementation of CETA/vocational education programs. At the policy-making level, the director of Adult Programs, who had been appointed by the Commissioner of Education to serve as TEA's representative on the SMSC, participated as a member of the SMSC's Plans and Coordination Committee, the committee which was responsible for setting policy for the Supplemental Vocational Education program. This allowed the TEA to have

---

*The material presented in this section is a summary of information gleaned from "A Preliminary Report on State-Level CETA Vocational Education Coordination in Texas," (Proaction Institute, 1978) and "A Procedural Guide for Utilization of Title I, Section 112 Funds" (Texas Education Agency, 1977--Revised).

input on policy that had direct impact on the administration of the program. It also provided the SMSC with feedback as to the program's success.

Another means of enhancing coordination was the interaction between GBPO and the Adult Programs staff which occurred on a day-to-day basis. The two agencies (GBPO and TEA) had an interagency agreement that specified each agency's administrative responsibilities and the basis for calculating reimbursable costs under Section 112. After the operating policies and procedures were set by the SMSC, the two staffs worked together to implement programs. Originally, TEA had received a state services contract (from the 4% Governor's Grant) for the administrative costs of the Supplemental Vocational Education Programs. After discovering that the TEA had been spending more on administrative costs than allowable under CETA regulation, reimbursement for administrative costs were transferred to the Section 112 grant.

As the agency responsible for the administration of Supplemental Vocational Education Programs, the Adult Programs Division of TEA worked with local prime sponsors to negotiate non-financial agreements, contract for the delivery of services, maintain records and reporting procedures, and monitor contract implementation. Once the prime sponsor determined its program needs, the field staff of the Adult Programs Division negotiated the contract, helped complete the necessary paper work, and insured that the program met state and federal guidelines. Before the TEA would approve a contract for a Section 112 program, there had to be an indication that the training to be offered would meet local labor market needs as determined by surveys conducted by the Texas Employment Commission.

With respect to policy, both the SMSC and TEA determined that Section 112 funds would be allocated exclusively for educational services, which included institutional training, adult education, high school equivalency instruction (GED), and English as a second language. Once a GED client was enrolled in a Section 112 program, funds could be used for counseling and guidance, vocational orientation, assessment, referral, job development, placement, and follow-up. Section 112 funds could not be used for medical assistance, allowance payments, child care, residential support, family planning services, or legal services. This policy was advocated by the SMSC, the TEA, and the GBPO because of the belief that the small amount of money available through Section 112 should be spent on training, while regular CETA Title I money could be made available for client services such as allowance payments.

Comprehensive Employment and Training
Amendments of 1978--Title II, Part A,
Section 204 (P. L. 94-524)

The Supplemental Vocational Education Assistance of the CETA Amendments was an extension of the CETA enactment of 1973; technical changes were included rather than a structural change of the set-aside.

Provisions of Title II

Title II is that section of the CETA legislation which establishes the programs administered by prime sponsors and is designed to provide comprehensive employment and training services for the economically disadvantaged. Three categories of services are provided as described on the following page:

1. Services for the Economically Disadvantaged

   - job search assistance
   - outreach
   - education and institutional skill training
   - work experience programs
   - supportive services

2. Occupational Upgrading and Retraining

   - provide eligible employees with skill development which results in qualifications for a position of greater skill, responsibility, remuneration, or career development
   - provide supportive services for individuals who have received notice of impending layoff and who have little opportunity for reemployment

3. Transition Employment Opportunities for the Economically Disadvantaged

   - provide eligible persons with transitional employment in public service and related training and services to enable them to move into unsubsidized employment.

Eighty-five percent of the funds available for Parts A, B, and C of Title II are allocated on a formula basis to prime sponsors; six percent of the funds available for Parts A, B, and C are to be used only for grants under Section 204 for supplemental vocational education assistance. One percent of the amount allocated for Parts A, B, and C of this title shall be used by the states for the costs of the state employment and training council. One percent of the amount allocated for this title shall be available to the governor of each state, in the same proportion as that state's allocation under subsection (a), for encouraging coordination and establishing linkages between prime sponsors and appropriate educational agencies and institutions as well as institutions providing training programs which are approved by the Secretary, and for services for eligible participants delivered jointly

by employment and training agencies and appropriate educational agencies and institutions. Four percent of the amount available for parts A, B, and C of this title shall be available to each governor in the same proportion as that state's allocation under subsection (a). The funds are for the governor's coordination and special services under Section 105, and, when deemed necessary by the governor, for additional support of the state employment and training council.

Because the primary focus of this report is on the use of Section 204 monies, more attention will be directed at that particular portion of Title II in the text that follows.

Section 204. Section 204 of Title II of the CETA legislation provides for supplemental vocational education assistance through special grants to the governors. The intent of this support is "to provide needed vocational education services in areas served by prime sponsors, in accordance with an agreement between the State vocational education board and the prime sponsor."

Purpose. The purpose of the funds available in Section 204 is to enhance prime sponsors' capability to deal effectively with manpower training needs as they have been identified at the local level. The word "effectively" applies to economical use of resources--particularly non-duplication of materials and services. The emphasis in Section 204 is also on the fostering of cooperative linkage among various local training agents.

Legislative provisions. CETA legislation states that six percent of the funds available for parts A, B, and C of Title II shall be

available only for grants under Section 204 for supplemental vocational education assistance. The text of P. L. 95-524, which addresses Section 204, is included as Appendix A of this document. Services and financial assistance provided with Section 204 monies must be in accordance with an agreement between the state education agency and the prime sponsor.

In addition to providing vocational education and related services (i.e., counseling and guidance, vocational orientation, assessment, referral to supportive services, job development, placement, and follow-up), funds may also be used to

- coordinate CETA programs with existing vocational education programs;
- coordinate the use of CETA funds and vocational education funds to enhance economic growth and development in the state;
- develop linkages between vocational education, CETA training, and private sector employers;
- provide technical assistance to vocational education institutions and local education agencies to aid them in making cooperative arrangements with appropriate prime sponsors;
- provide information, curriculum materials, and technical assistance in curriculum and staff development to prime sponsors.

Rules and regulations. The rules and regulations as published in the Federal Register provide for the distribution of Section 204 monies and the development and operation of Section 204 programs. The money (6% of total funds for Title II, A, B, C) is allocated by the governor to prime sponsors in the state based on a previously agreed upon formula. The manner in which the allocated monies will be used is decided upon and formalized through a non-financial agreement between the prime sponsor

and the state board of vocational education or an equivalent agency. The non-financial agreement, including required budget information and program narrative, is subject to the final approval of the governor.

The rules and regulations further describe the use of funds provided under Section 204. In addition to the use of funds described in the previous section (Legislative provisions), not less than 85 percent of the funds provided for vocational education assistance shall be used for providing vocational education services to the prime sponsors' eligible CETA participants. Of that 85 percent, not more than 20 percent may be used for administration. At least 50 percent of the vocational education funds allocated to administration shall be made available to the local prime sponsors areas unless the Governor can provide adequate justification for not doing so to the Regional Administrator. The distribution of the total 204 allocation as described above is displayed graphically in Table 1.

Table 1: Distribution of Funds Allocated Under CETA Title II, Section 204 for Supplemental Vocational Education Assistance

Regulation					
677.32(a)	Total A,B,C	x	.06	=	Total Section 204 funds
677.39(e)	Section 204 Allocation	x	.85	=	Amount of 204 allocated to Prime Sponsors
677.39(e)(1)	Prime Sponsor's 204 Allocation	x	.20	=	Maximum 204 funds to be used for administration
677.39(e)(2)	Maximum 204 Funds to be used for Administration	x	.50	=	Mandated amount of administrative monies to to go Prime Sponsor

Summary of Section 204

Although the basic intent of the supplemental vocational education assistance program remained the same when amended in the CETA legislation of 1978, significant modifications were made. The legislation, itself, specified that funds will be made available to the Governor to provide financial assistance for needed vocational education services as in the past, but the provision of these services in the areas served by the prime sponsors had to be "in accordance with an agreement between the State vocational education board and the prime sponsor." In addition, the law mandated that prior to entering any agreement, the State vocational education board must consult with and obtain the advice of the council which is involved in the formulation of the State plan for vocational education under provisions of 107(a)(1) of the Vocational Education Act of 1963. Finally, there were also provisions for the allocation of funds and the activities for which the monies could be spent--vocational education and services to participants, program coordination, development of linkages with the private sector and the provision of technical assistance, information, and curriculum materials.

With respect to the allocation of funds, prior to 1978, five percent of the funds available for Parts A, B, and C of Title I (CETA, 1973) were available for grants under Section 112 for supplemental vocational education assistance. In 1979, after the enactment of the CETA amendments, six percent of the funds for Parts A, B, and C of Title II were available for supplemental vocational education assistance under Section 204. In 1979, the distribution of funds available through Section 204

could be broken into two amounts. Subsection 204(c)(1) states that no less than 85 percent of the funds available must be used for providing vocational education and services to CETA eligible clients. Subsection 204(c)(2) states that the remainder of the available funds could be used for program administration, coordination, and technical assistance.

Generally speaking, the 204 monies available for providing vocational education and services to CETA eligible participants may be used to pay costs for tuition, tools, books, materials and supplies, and salaries of instructors or personnel delivering the services. Section 204 monies may be used to support remedial/basic education courses. Some prime sponsors may prefer to utilize the funds strictly for skill training.

Title II, Part A, Section 204 as Implemented in Texas

Organizational Structure

The distribution of monies under Section 204 has not deviated greatly from the way it was handled under Section 112. The Department of Labor allocates the funds through the Governor to the Texas Department of Community Affairs (TDCA) which in turn notifies prime sponsors of the amount of their allocation and informs the State Vocational Education Board about the allocations. TDCA then develops an interagency agreement with TEA for the services to be provided CETA participants in each prime sponsor area. The TEA subsequently enters into a non-financial agreement (NFA) with each prime sponsor. The NFA spells out the types of educational services that will be provided to each prime's 204 program

participants based on the amount of 204 monies allocated to the prime. TDCA then develops an application based on the NFAs which it submits to the Department of Labor for review and final approval. Upon approval of the application, TDCA provides the funds to the State Vocational Education Board. The State Vocational Education Board is then responsible for implementing the NFAs and TDCA monitors the programs' implementation.

The TEA subcontracts for training services only with those training institutions which have been certified by TEA. Certified institutions include both public and private schools. When the NFAs have received final approval and the programs have begun, eligible participants are referred by prime sponsor to the local education agencies (training institutions) with whom TEA has subcontracted. In some cases, instead of referring individual participants to classes in a local training institution, the prime sponsor may fund a particular class to train CETA 204 program participants exclusively.

Figure 2 (p. 27) indicates the flow of funds for administering and implementing Section 204 currently in Texas.

Non-Financial Agreements

Each prime sponsor, in collaboration with the Texas Education Agency, will be responsible for the negotiation of a nonfinancial agreement (NFA). It is the role of the Texas Department of Community Affairs to regulate allocations of funds, to issue guidance in the preparation and modification of NFA documents, and grant final approval of all NFAs and any modifications. The role of the Texas Education Agency is to administer all other aspects of the program.

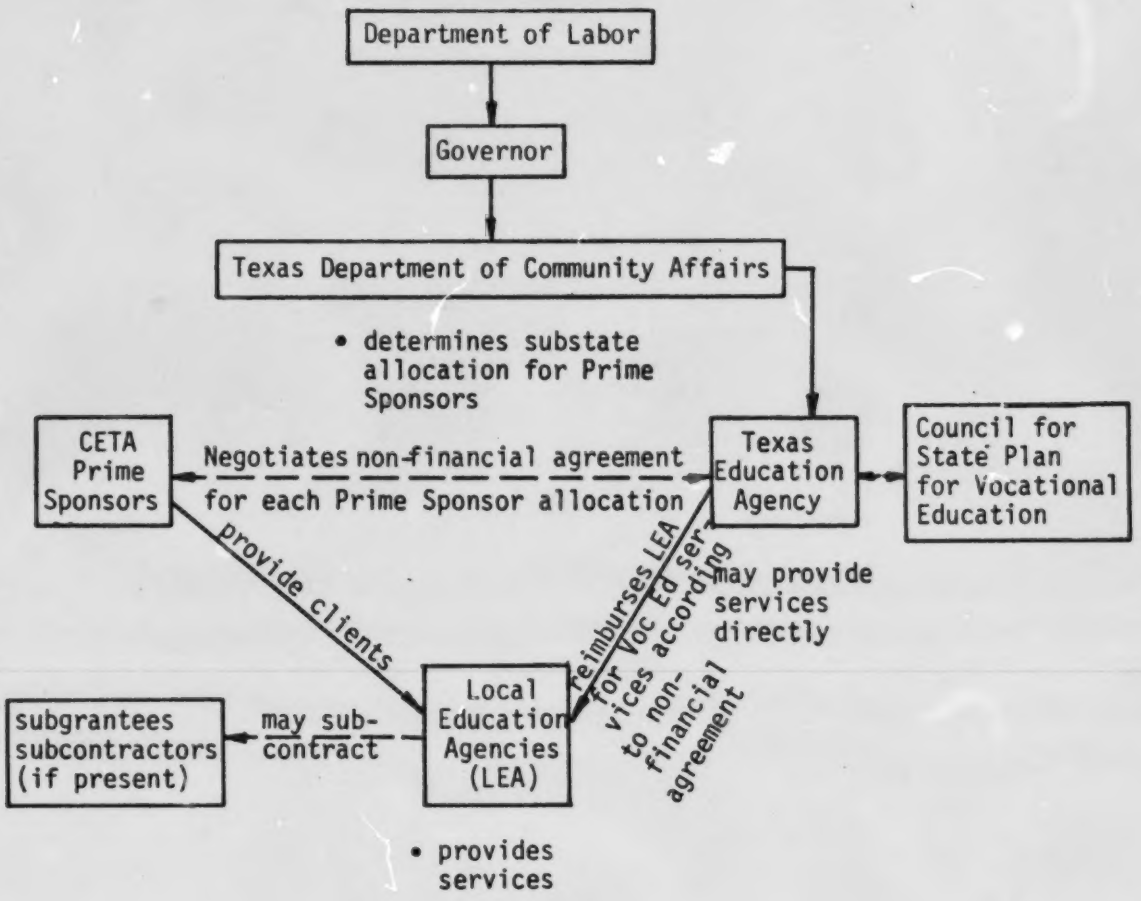
Department of Labor
Governor
Texas Department of Community Affairs
• determines substate allocation for Prime Sponsors
CETA Prime Sponsors
Negotiates non-financial agreement for each Prime Sponsor allocation
Texas Education Agency
Council for State Plan for Vocational Education
provide clients
reimburses LEA for Voc Ed services according to non-financial agreement
may provide services directly
subgrantees subcontractors (if present)
may sub-contract
Local Education Agencies (LEA)
• provides services

Figure 2: Organization for Distribution of Section 204 (6% funds) in Texas.

The NFAs are developed in response to the amount of 204 monies available to each prime sponsor; they are binding on all prime sponsors and the Texas Education Agency. The content of all NFAs is stipulated by DOL and includes the following:

1. Vocational Education Agreement Signature Sheet
2. Program Narrative--describing the linkage system and the responsibilities of each party. It shall include a description of the prime sponsor's Management Information System. Also included in the narrative is a description of the following:

- The objectives and need for these services and training.
- The results and benefits expected from these services and training.
- A description of the training to be provided, as set forth in the Prime Sponsor Comprehensive Employment and Training Plan.
- An identification of the potential recipient(s) (training institutions) of the funds for program administration.
- A description of all services for CETA eligible participants enrolled in training programs funded under the NFA which will be provided by or wholly or partially funded by the TEA, a statement of the amount of 204 funds which shall be provided for each service, and a delineation of the method by which the services will be provided.

3. Special Grant-Program Planning Summary
4. Special Grant-Budget Information Summary
5. Assurances

After review of the NFA by TEA and TDCA, final approval will be granted by TDCA. Steps for the modification of NFAs are also stipulated by TDCA.

Allowable Services

The services described in the NFA as those which will be provided to participants must be in keeping with those allowable educational services as specified by TDCA. Types of educational services include the following:

- Institutional Training. A systematic sequence of classroom and/or laboratory instruction for CETA clients designed to impart skills or knowledge prerequisite to a particular occupation or skill as defined in the client's employability development plan (EDP).

- Adult Education. Academic education for individuals aged 16 and older without a high school diploma or equivalency certificate, and who have been determined to be unable to perform at minimum performance levels. Areas of instruction include communication skills, computation skills, interpersonal relationships and general knowledge acquisition.

- High School Equivalency Instruction (GED). Institutional training given to enable one to pass an examination certifying achievement equivalent to a high school diploma.

- English as a Second Language (ESL). Institutional training designed to assist those CETA clients with limited English speaking ability.

After CETA participants have been enrolled in an authorized educational program, the following additional services may be provided:

- Counseling and Guidance. Professional level activities involving assisting people to evaluate their skills and goals effectively; helping clients to plan consistent with those goals; and actively engaging in efforts to help clients meet personal or job stresses effectively.

- Vocational Orientation. The process of informing the client of the opportunities available as the result of training or work experience, to acquaint them with the vocational training courses planned for them, to inform them of employer expectations, and to inform them about available supportive services.

- Assessment. The identification of strengths and weaknesses of the enrollee to assist him/her in developing his/her capabilities. Through assessment, employability plans are developed and determinations are made regarding assignment of the enrollee to the appropriate vocational program components.

- Referral to Supportive or Employment and Training Services. Referral to agencies providing services designed to contribute to the employability of participants, enhance their employment opportunities, assist them to retain employment and facilitate their movement into subsidized employment. Such referrals must be made in keeping with the prime sponsor's plan or by prior arrangements with the service agency(ies).

- Job Development. Working with public and private organizations and businesses to develop job opportunities for persons participating in manpower programs.

- Placement. The hiring of an individual into unsubsidized employment after being referred by the prime sponsor or its subgrantee or contractor for a job or an interview. (If this service is provided by an educational insitution, appropriate documentation must be provided the prime sponsor in order to include such placements in the prime sponsor's Title II, B-C Quarterly Program Status Summary.)

- Follow-Up. Periodic contact with former enrollees to determine the success of the placement, the enrollees, and the manpower program.

In addition to the services listed above there are a number of other supportive services which may be provided to program participants. When the prime sponsor and TEA agree, funds might be used for the support services listed below:

- Medical Assistance
- Child Care
- Residential Support
- Assistance in Securing Bonds
- Family Planning Services
- Legal Services
- Transportation

PART III: REVIEW OF PREVIOUS STUDIES ON CETA/VOCATIONAL EDUCATION COORDINATION

Early in the conduct of this assessment, the Education-for-Work Linkage Project staff attempted to gather research reports that might provide background information or models for assessing Title II, Part A, Section 204 of the CETA amendments. The research studies were also reviewed with respect to methodology and instrumentation that could be utilized for this activity. However, no research was identified which focused exclusively on Section 204; and no instrumentation or models were identified which had been developed to specifically assess the utilization of Section 204 funds.

One national study which addressed the effectiveness of Title I, Section 112 (the predecessor to Title II, Part A, Section 204) was identified. This study was funded by the Department of Labor and conducted by the Middle Cities Education Association; it was concerned with the effects of the Education Amendments of 1976 in terms of required linkages between CETA and postsecondary vocational education at national, state, and local levels. Three states (Michigan, New Jersey, and Texas) were studied using survey research methods, longitudinal analysis, and telephone and personal interviews. This particular study noted that the level of coordination between CETA and vocational education had increased since the 1976 legislation had been enacted. State level coordination also appeared to have improved substantially; but at the local level, there has been only minor indications of improved coordination. The study was completed in March of 1979.

Other studies which addressed linkage and coordination issues of a general nature were reviewed and are summarized in Table 2 of this report.

A total of 10 studies that held significance for the conduct of this assessment were identified. Eight of the ten studies were national in scope, but two of these eight national studies utilized the case study approach in the following states: Michigan, New Jersey, Texas, Louisiana, Minnesota, and Maryland. Two of the 10 studies had state-specific objectives; they were conducted in Kentucky and Illinois.

Of the 10 studies, five were funded directly by the Department of Labor, and one indirectly through the Governor's Office of Manpower and Human Development in Illinois. Two were funded by the U. S. Department of Education directly, and one through the State Department of Education in Wisconsin. One was funded by a combination of sources in Kentucky: the State Department for Human Resources and the State Department of Education.

Consensus views expressed in the research reports indicate the following:

- CETA/Vocational Education coordination is positive and working well in most states
- CETA/Vocational Education coordination increases the available programs and services for CETA clients
- Most of the problems in CETA/Vocational Education coordination must be solved at the local level
- There is a need for technical assistance and training to understand and implement program options through linkage mechanisms.

Summary comments regarding the major findings and conclusions of each study are presented in Table 2.

Table 2: Summary of Research Studies on CETA/Vocational Education Coordination

Author/Year	Scope	Purpose	Methodology	Major Findings and Conclusions
Conserva, Inc./1980 (funded by USOE)	National	To study effective mechanisms for facilitating coordination of Vocational education programs with CETA title IV youth programs	Exemplary programs were nominated and directors interviewed	• CETA/Vocational Education Legislation has been the key factor in the establishment of coordination. • There is need for increased technical assistance and training.
Lamar & Owens/1980 (conducted by University of Kentucky; funded by Kentucky State Dept. for Human Resources and State Dept. of Education)	State: Kentucky	To determine the feasibility of developing a functional plan for the coordination, cooperation, and collaboration of vocational education with CETA; to identify issues, concerns, problems, and barriers preventing the establishment of CETA/Voc. Ed. relationships	Mail surveys to CETA and Vocational education personnel in the state; analysis of government documents; reviews of secondary sources	• Coordination problems between CETA and vocational education are due to insufficient communication, inadequate understanding of programs, philosophical differences, and turf protection. • Attention to the organizational structure of coordination serves to strengthen linkages.
Rogers & Schifferli/ 1980 (funded by U. S. Dept. of Education)	National	Overview of State Departments of Vocational Education involvement with CETA in FY 1979	Information gleaned from internal reports of CETA Coordination Unit and studies of other agencies	• Department of Education needs to focus attention on Legislative and Policy Changes; Technical Assistance, Training and Information.
Colmer, J. & Wurzburg, G./1979 (conducted by National Council on Employment Policy; funded by DOL)	National (DOL/National Council on Employment Policy & Education & Public Affairs	Review progress that local CETA sponsors and LEAs have made toward collaboration	Interviews and mini-case studies	• It will take time and follow-up policies for interest in YEDPA to build. • Linkage must begin at the local level.
Middle Cities Education Association/ 1979 (funded by DOL)	National/ State/Local: New Jersey, Texas, Michigan	To ascertain the effects of the 1976 Education Amendments on required linkages between CETA and post-secondary vocational education at national, state, local levels	Longitudinal analysis using survey research, personal and telephone interviews	• The level of coordination between CETA and Vocational Education has increased since VEA of 1976. • State-level coordination appeared to have improved substantially. • At the local level there has been only minor indications of improved coordination.

Author/Year	Scope	Purpose	Methodology	Major Findings and Conclusions
National Association of State Boards of Education Study: Vol. I & II/1979 (funded by DOL)	State: Louisiana, Minnesota, Maryland	To examine three principal issues of youth employment and vocational education coordination; To use a systematic approach to the identification of barriers to coordination	A Task Force in each state examined problems of CETA/Vocational Education coordination in specific areas, identified solutions, and developed stragegies for linkage	• Task Forces may be effectively used to identify barriers to coordination and resolve issues in CETA-Vocational Education coordination.
Rist, R. et al./1979 (conducted by Youth Work, Inc., funded by DOL)	National	Study of CETA/Vocational Education cooperation to develop innovative programs for low-income youths	Observations and Interviews	• Too early to draw firm conclusions and posit final recommendations about the potential of CETA/Vocational Education cooperation. • Attention must be focused on communication/collaboration. • Programs have increased educational and employment training opportunities.
Sultan, P./1979 (conducted by Southern Illinois University; funded by Governor's Office of Manpower and Human Development)	State: Illinois	To gain information on the collaborative agreements developed by prime sponsors and balance-of-state offices	Intensive site interviews with local CETA and Vocational Education staff	• The overall conclusion reached was that the CETA program is working well. • The ways of dealing with problems and difficulties in CETA coordination need to be diverse and tailored to particular situations.
U. S. Conference of Mayors/1979 (funded by DOL)	National	To gain information on the current status of CETA/Vocational Education coordination	Mail questionnaires to a random sample of prime sponsors; mail survey of state-level CETA supervisors; and selected site visits	• Progress in CETA/Vocational Education coordination has been made. • Perceptions of barriers to coordination have changed. • Vocational education was more heavily represented in CETA planning during FY 1978.
Wisconsin Research Coordinating Unit/ 1979 (funded by Wisconsin State Dept. of Education)	National	Determine extent that vocational education delivery systems were involved in CETA programs	Mail survey questionnaires	• High degree of cooperation, coordination, and linkage between CETA and Vocational education exists in most states. • Recommended cooperative efforts be improved and expanded; suggested investigation of gaps in services and duplication of effort.

PART IV: FRAMEWORK FOR ASSESSING SECTION 204 IN TEXAS

As pointed out in Part I of this report, federal provisions for employment and training programs have included various strategies for fostering and initiating inter-agency coordination and linkage in order to utilize existing resources and prevent duplication of efforts in meeting the needs of clients who desire and can benefit from employment and training services. These coordination and linkage provisions have received mixed reviews as to their intent, effectiveness, and outcomes in relation to the evolution of employment and training programs as they currently exist.

Due to the emphasis on coordination and linkage, attempts to study, assess, and report results are laudable. It is appropriate to review continuously the results of such coordination and linkage to ascertain what the results of these connections bring. However, it is difficult for policy researchers to ascertain or identify clear and concise purposes for such coordination and linkage in order to judge if results have been achieved. Are the phenomena of linkage and coordination strategies the result of quests for program improvement on the part of the Department of Labor, or are they merely Congressional mandates to provide a series of checks and balances between competing political coalitions.

Across the country, previous researchers have continuously attempted to document the process of linkage; no previous research was found that attempted to apply outcome measures to the linkage and coordination exercise. Perhaps such outcome measures would be inappropriate at this time, given the short time span which the current CETA program operators have

had to work with potential linkage agents to effectively engage in joint efforts on behalf of clients. Perhaps it is too early to ask questions regarding intent and outcome, such as:

- Do coordination and linkage activities serve to strengthen and broaden the range of services or quality of programs offered to the CETA client?
- Do linkage agents offer a dimension of service that the CETA client would not otherwise have?
- Do linkage activities represent an effort to consolidate and integrate alternative delivery systems to better serve client needs?
- Or, do linkage activities merely serve to keep competitive delivery systems quiet through a sort of pay-off approach rather than shared planning.
- Or, do the mandated linkages prevent the CETA prime sponsor from offering services that clients could utilize more advantageously?

The overriding questions that remain to be answered if the CETA/vocational education connection is to be fostered and continued include:

- Who is to benefit from linkage activities? the client? the linkage agent? or the Prime Sponsor?
- What criteria should be used to assess linkages?
- What characteristics best describe successful linkages?

Purpose of Assessing Section 204 in Texas

The purpose of assessing Section 204 of CETA in Texas is to analyze the process for planning, implementing, and evaluating this particular linkage and to make recommendations for improvement. Specific objectives of the assessment include:

- To bring fuller understanding of state and local level policymakers and program implementers about the historical background of CETA/Vocational education coordination and linkage.

- To assess the extent of planning on the part of CETA prime sponsors and vocational education in administering Section 204;
- To assess the extent that Section 204 complements and extends the impact of the CETA program as a supplementary provision;
- To assess the value and effectiveness of Section 204 as seen by the linkage agents involved;
- To assess the extent that communication has resulted regarding the availability of Section 204;
- To identify concerns of linkage agents to better implement Section 204;
- To ascertain typical problems and innovative uses of Section 204 in other states; and
- To make recommendations for improving the procedures for administering Section 204.

The ultimate goal of the assessment was to provide a state-of-the-art or status report which describes the current Section 204 program in Texas.

Conduct of the Assessment

The conduct of the assessment of Section 204 was organized into three phases. Phase One included the following activities:

1. A review of what other States were doing with their Section 204 funds was initiated;
2. A literature review was begun, and remained ongoing, regarding previous studies on linkage and coordination, especially with respect to the Supplemental Vocational Education Assistance;
3. Meetings were held with personnel of both the Texas Department of Community Affairs and Texas Education Agency to solicit their perceptions of the status of the Section 204 activities, (attention was focused on the intent, the problems, the potential, and specific needs of the agencies that might be accomplished via the assessment); and
4. Copies of non-financial agreements were analyzed to determine how Section 204 funds were being used.

Phase Two of the assessment included the following activities:

1. A conceptual design was completed, identifying the purposes of the assessment, the limitations, and the delimitations of the assessment;

2. Rosters were developed for the populations (groups) which were to be contacted; and

3. Survey instruments were designed for use with target populations for purposes of the assessment.

Phase Three of the assessment included the following activities:

1. Survey information was gathered from four populations:

   a. CETA prime sponsors in Texas;
   b. Educational institutions who were contractors for delivering Section 204 services;
   c. Education institutions not involved in non-financial agreements to provide services under Section 204, but who seemed to be eligible or likely potential linkage agents; and
   d. Members of the Governor's office staff in other states who were responsible for Section 204 activities.

2. Information was analyzed; and

3. Conclusions were drawn and recommendations written.

Significance of the Assessment

This document should provide state-level administrators and policy-makers, as well as local-level prime sponsors and linkage agents with information that will assist in better planning and administration of Section 204 programs. The report will provide consensus statements regarding program improvement, as well as individual comments and suggestions.

Problems of the Assessment

Certain problems have been inherent to the design of the assessment effort. These problems are listed below:

- The task of assessing Section 204 would possibly be more credible if undertaken as part of assessing the overall planning and provision of services for CETA clients. To evaluate one part of CETA in isolation from the rest may eliminate important information that this particular assessment was not able to obtain.

- The task of assessing any part of CETA at a time when severe budget cutbacks are being completed and when CETA has had unfavorable press coverage is bound to create some bias on the part of survey participants.

- The task of assessing the relative merit of the supplemental vocational assistance would require more information on the part of the assessment team about each prime sponsor region. That information was unavailable at the time of the assessment.

PART V: STATUS OF THE SECTION 204 PROGRAM IN TEXAS

The purpose of this section is to present information gathered about the Section 204 program as it currently exists within the state of Texas. Kinds of information gathered by project staff included (a) the Non-Financial Agreements (NFAs) which have been negotiated, and (b) the input received via site visits or telephone interviews. The latter information will be presented according to the groups which were contacted: individuals on prime sponsors' staff responsible for planning and monitoring the respective Section 204 programs, persons at local education agencies who provided training and services negotiated under provisions of the NFAs, and representatives of local vocational education leadership who did not participate in Section 204 programs.

Non-Financial Agreements

A review of NFAs submitted by each Prime Sponsor--including the Balance-of-State Prime Sponsor--focused on the program narrative of the NFAs which outlined the types of activities and services which were to be provided. Although the information was gleaned from a perusal of the NFAs, there was corroboration through the telephone interviews and site visitations that the planned programs actually were being implemented. However, it should be noted that the Section 204 programs are subject to modification at the request of the prime sponsor. Therefore, due to the fact that a considerable number of changes have been made and will continue to be made, the information presented in this subsection is subject to change at any point in time. Consequently, the

analysis should be viewed as a general synopsis of the overall programmatic thrust. The quantitative information may vary slightly from actual figures.

Under provisions of the Rules and Regulations published in the Federal Register, NFAs have been negotiated with all 28* prime sponsors in the state. The total allocations for the contracts have amounted to more than $6.7 million as of May 15, 1981. Other allocations for Section 204 funding included those for Texas Education Agency (TEA) Administration, Texas Department of Community Affairs (TDCA) Administration, Special Project(s), and unobligated funds (see Table 3 for specific amounts).

Table 3: Fiscal Obligations for Section 204--FY 1981**

Total Allocations to Prime Sponsors	$6,721,631
TEA Administration	215,483
TDCA Administration	426,447
Special Project (Texas A&M University--Training for Inmates of Correctional Institutions)	309,436
Unobligated	90,497
TOTAL GRANT	$7,763,494

As mentioned previously, all 28 prime sponsors in the State have been involved in NFAs. As a result of these cooperative arrangements, 93 local training institutions have been participating in the Section 204 program; this level of involvement has required the development of approximately 300 different funding agreements. Among the local training

*The figure 28 includes the 27 prime sponsors in Texas and the prime sponsor for Arkansas which serves Texas citizens located in Bowie County.

**Fiscal obligations as of May 15, 1981.

agencies, there have been 36 postsecondary institutions, 33 independent school districts, 14 private schools, three senior colleges, three hospitals, and all four campuses of the Texas State Technical Institute which have contracted to provide training and/or services. (In some instances, the same educational institution has contracted to serve more than one prime sponsor.)

In five of the 28 prime sponsor regions (or 18%), it was reported that only Adult Basic Education (ABE), English as a Second Language (ESL), General Education Development (GED), and pre-vocational programs were being offered. In the remaining 23 regions (82%), ABE programs and other similar learning experiences were available, but the emphasis was on skill training.* Also, it should be noted that 14 of the 27 prime sponsors (excluding the Balance-of-State) had multiple contracts with training institutions; that is, 52% of the prime sponsors had more than one education institution involved in providing training/services under provisions of an NFA. Within the Balance-of-State, five of 14 (or 36%) program contractors had entered into agreements with more than one education agency. As a consequence, the amount of time and effort required by TEA and TDCA to monitor the forms preparation, modification process, equipment purchases, report development, and various other aspects of these cooperative agreements has been substantial.

More specifically, the cooperative skill training efforts which were planned by the prime sponsors and documented in the NFAs are reported in Table 4. This is not an exhaustive list because of frequent

*These figures are based on the planned training and services documented in the Non-Financial Agreements for each prime sponsor.

Table 4: Number and Percent of Prime Sponsors Who Reported Participation in Cooperative Skill Training Programs Funded Under Section 204. (Figures include only those skill areas most frequently reported)

Program Area	28 Prime Sponsor Regions		23 Prime Sponsor Regions*	
	Number	Percent	Number	Percent
Welding	17	61	17	74
Auto Mechanics	16	57	16	70
Clerical	12	43	12	52
Vocational Nursing	12	43	12	52
Air Conditioning/Refrigeration	11	39	11	48
Cosmetology	10	36	10	43
Drafting	9	32	9	39
Machine Shop	9	32	9	39
Office Occupations	9	32	9	39
Auto Paint & Body	8	29	8	35
Medical Technology	8	29	8	35
Electronics Technology	7	25	7	30
Radio/TV Repair	7	25	7	30
Secretarial Science	7	25	7	30
Building Trades	6	21	6	26
Child Care/Development	6	21	6	26
Diesel Mechanics	6	21	6	26
Bookkeeping/Accounting	5	18	5	22
Barbering	5	18	5	22
Computer Science	5	18	5	22
Dental Assistant/Technician	5	18	5	22
Truck Driving	5	18	5	22
Data Processing	4	14	4	17
Meat Processing	4	14	4	17
Printing	4	14	4	17
Nurse's Aide	4	14	4	17
Appliance Repair	3	11	3	13
Electrical Trades	3	11	3	13
Law Enforcement	3	11	3	13
Small Engine Repair	3	11	3	13
Heavy Equipment Operator	2	7	2	9
Upholstery	2	7	2	9
Livestock & Ranch Operations	2	7	2	9
Solar Energy Technology	2	7	2	9
Business Machine Repair	2	7	2	9

*These 23 Prime Sponsor regions emphasized skill training.

modifications which are being made, but the approximate number and percentages of prime sponsors providing specific types of vocational training illustrate the general thrust and direction for the total Section 204 program. The information was presented for all 28 prime sponsor regions and also for just those regions which have a primary emphasis on occupational skill training. (The presentation of the information in this format enables a comparative assessment of priorities for occupational training across several vocational areas.)

Survey of Prime Sponsors

In order to assess the status of program activities in Texas funded with Section 204 monies, information was gathered from Prime Sponsor staff members who were responsible for planning and monitoring these activities. On-site visitations and telephone interviews were used to gather the information.

With respect to planning for 204 funded activities, respondents indicated that a wide variety of data was used in identifying the kinds of programs contracted under the Section 204, Non-Financial Agreement (NFA) for FY 1981. In addition, the staff of the Prime Sponsors, in most instances, attached a considerable range of relative importance to particular resources used. Prime sponsors noted that 204 funds are linked (during planning and program implementation) directly to the other programs supported under Title II of the legislation and do not stand in isolation for planning purposes. As a consequence, these funds are viewed as an additional source of revenue to be tapped,

and planning is organized within the context of the total CETA effort in the Prime Sponsor region rather than a single program among many.

More specifically, Prime Sponsor leadership felt most confident about their planning effort when they accessed information from a number of sources. Those sources and the types of information which have frequently been used include demographic information from the Master Plan, a listing of existing and planned occupational training programs and services available from educational agencies within the immediate geographic proximity, supply/demand information from the Texas Employment Commission (TEC), local labor market studies conducted by the Prime Sponsor's staff or others, supply/demand information available from the Texas Education Agency (TEA), and placement rates for individual programs. In some instances, community forums have been held to discuss labor market needs within specific occupational areas.

In addition to the prime sponsor staff, other significant groups had the opportunity for input to the planning of the Section 204 program activities. For the most part, the Prime Sponsor's Planning Councils and/or the Private Industry Councils (PICs) have had significant impact either as reviewers of proposed plans or actively participating with input to the planning process. In most instances, it is apparent that representatives of the local education agencies (secondary, postsecondary, and proprietary) have direct input to the planning process as members of the previously mentioned councils or through announced meetings open to the public. Also, there have been instances where job developers and community coordinators on the Prime Sponsor's staff have served as valuable resources in the initial stages of program formulation.

In terms of formal needs assessments to determine the kinds of training needed within the Prime Sponsor region, there have been attempts to access the desired data. However, these attempts have not been considered highly successful. In some instances, Prime Sponsor staff members expressed concern that information gathered from TEC may not be as useful as desired; efforts to collect information on a local basis have been undesirable because the response rates on questionnaires has been very low. As a result, staff members seek out other accessible data and have made plans for the PIC to become more actively involved in such activities in the future. On the other hand, there is some concern that such activities will require financial aid and technical assistance.

In terms of the barriers to effective planning for the use of Section 204 funds, there was a general feeling that certain barriers were related to coordination (or the lack of coordination) while others were related directly to the process of planning. In the case of the former, there was strong feelings that conditions have significantly improved within the last year, but there was still felt to be existing problems of coordination between TDCA, TEA, local education agencies (LEAs), and Prime Sponsor staff which needed attention. Due to the fact that there are a minimum of the four agencies mentioned above involved in the development and approval of a NFA, there are concerns that "excessive" bureaucracy is involved in the expenditure of Section 204 funds. Also, it was suggested that the flow of communications has not always been optimal and there have been some time delays associated

with contracting, equipment purchasing, and other program activities. Those barriers which were specifically related to the process of planning were concerned with a lack of "good" labor market information for local prime sponsor areas, lack of maximum flexibility with respect to the expenditure of funds (e.g., using 204 funds for allowances when no other funds are available), and a planning cycle which attempts to bring two public programs--CETA and the secondary-postsecondary education systems--together in a cooperative relationship while each operates on different fiscal years.

As far as the overall purpose of Section 204 is concerned, there appears to be some confusion with respect to intent. For instance, in most cases, Prime Sponsor staff members did indicate that they felt the program was intended to encourage classroom-type occupational training, create linkages between the CETA programs and public/private training agencies, provide fiscal resources to public/private training agencies, decrease duplication of training programs, coordinate available facilities and training, and provide the skill training needed for economically disadvantaged persons to gain unsubsidized employment. However, a small minority of individuals indicated that they perceived the purpose to be an attempt to establish a link between the Governor's office and education agencies. There are also those persons who wonder why so many bureaucratic agencies are involved with the policymaking and planning of programs funded with 204 monies--TDCA, TEA, LEAs, and Prime Sponsors.

Therefore, differing opinions on whether or not the goals of the Section 204 have been achieved are still pending. There is consensus

that individuals who need the training are being served and that there has been success in placing individuals in unsubsidized employment. However, there are some concerns that confusion still surrounds the NFA development process, program implementation in terms of allowable expenditures, and the belief that there is untapped potential in terms of what could be done with 204 funds (as noted in the Rules and Regulations).

On the other hand, although there was some concern about the number of agencies directly involved with the Section 204 funded activities, there was agreement that conditions specific to the planning, organization, implementation, and monitoring of the programs has improved substantially just during the last year. The individuals interviewed generally indicated that they felt that for FY 1981, there was more direction, better organization, and considerable structure associated with the funded activities than in the past; they also indicated that the cooperative relationships between the two state agencies, TEA and TDCA, had improved tremendously during 1980-81. However, the hope was expressed that this latter trend not become static; it was felt absolutely necessary that state-level leadership continue to improve on the substantive planning for the use of 204 funds. Also, because two state-level agencies were involved directly in the utilization of these funds, it was believed to be most desirable for all parties involved, including the Prime Sponsor and the LEAs, to make every effort to continue improving on the timeliness of information dissemination; better "turn-around" on contractual arrangements, modifications, equipment purchases

and reporting; and substantive planning associated with the use of 204 funds.

There is apparently some confusion about the relationship between the Prime Sponsor, the local education agency (LEA), TDCA, and TEA as related to supplemental vocational education assistance. In some instances, prime sponsor staff members have placed CETA clients in programs and helped develop the NFA, but they do not feel they provide much leadership in this effort; they have indicated that they perceive the relationship to be primarily between TEA and the LEA with the Prime Sponsor having only minimal influence over the situation. Conversely, there are other Prime Sponsors who feel they play a highly visible and dynamic role in the program offerings associated with the expenditure of 204 funds. As a result, there is evidently a need on the part of some Prime Sponsor staffs to be more clearly informed of Section 204 intent, their role, and their responsibilities.

Given this situation, several suggestions were made by Prime Sponsors for technical assistance which might be provided to Prime Sponsor staffs concerning the use of 204 funds. They include:

1. Instructions about how to conduct labor market studies to more effectively identify the occupations for which there are openings in the local area.

2. Learning how to assess program quality to determine which educational agencies would be the most appropriate as service deliverers in a Section 204 NFA.

3. An orientation to developing NFAs from the perspective of planning and budget development; attention would be focused on managing 204 program activities, monitoring these activities, equipment acquisition, property management, and equipment exchange.

In general, the persons interviewed were satisfied that their activities funded with 204 monies were reasonably successful with the exception of minor problems. In most cases, they felt positive about their completion and placement rates, the quality of instruction, and the conscious effort to support the vocational training of the CETA clients. Prime Sponsors indicated that successful 204 programs would be characterized by several qualitative program dimensions on the part of Prime Sponsors. These included: (1) program leadership which is committed to success; (2) good working relationships with other significant agencies and institutions; and (3) a good communications network. Prime Sponsors also pointed out characteristics for successful linkage on the part of vocational education as follows: (1) individualized vocational training within a flexible service system designed to meet the needs of individuals was imperative; (2) arrangements for training across a wide array of high demand occupational/technical areas for which there would be a greater assurance of a high placement rate when individuals had completed their training; and (3) a close working relationship between the CETA eligible client, CETA counselor, and representative (e.g., instructor) of the respective training institution to the desired outcome--placement in unsubsidized employment.

Various actions which have been initiated to evaluate and assess the effectiveness of the Section 204 funded programs have included both formal and informal techniques. In the latter case, various Prime Sponsor staffs have conducted informal evaluations of equipment, facilities, and instruction; they have engaged in regular periodic visitations

to the respective training institutions; and they have conducted exit interviews to determine why individuals decide to leave a particular training program. Other more periodic and formal types of assessment have involved reviews of quarterly reports, budgets, and placement rates; follow-up studies on former CETA clients; and a comprehensive study of former clients with respect to job status, income, and other occupational characteristics. Still other evaluation activities have included the collection of data from former CETA clients to be analyzed by occupational training program and training facility (this will enable a comparative analysis of programs); an assessment of cost effectiveness/benefits; and an institutional evaluation to determine the extent to which program objectives have been achieved.

Survey of Program/Service Deliverers

The survey of Section 204 program/service deliverers focused on: (1) assessing the impact of 204 programs on the capability of the vocational contractor to provide programs and services to individuals; (2) identifying perceived barriers, problems, and concerns relative to the CETA 204 program; and (3) obtaining suggestions and recommendations for improving the delivery of 204 programs and services across the state. Data for the survey was collected from key administrators and leaders responsible for the 204 programs/services at the public secondary and postsecondary educational institutions, proprietary schools, technical institutes, and hospitals participating in non-financial agreements within the State of Texas during FY 1981.

Impact of 204 funds on service provider's system. A review of the information collected concerning the impact of 204 funds on the overall system of the vocational service contractor revealed the following:

- The use of 204 funds enabled the vocational program/service deliverer to expand their programmatic efforts in order to become more responsive to community and individual needs;
- The use of 204 monies enabled agencies and institutions to provide programs and services to CETA eligible clients who would not otherwise be able to attend because of their inability to pay for tuition and institutional costs;
- Section 204 funds also provided additional operating funds to many agencies and institutions by increasing their enrollments and tuition base;
- The participation in 204 programs enabled many individuals either to remain in educational settings, acquire vocational skills needed for entry-level employment, or to continue their training through adult education or enrollment in postsecondary educational institutions;
- The use of 204 funds have also increased options to individuals by providing for the development of individualized, mainstreamed, and non-traditional programs.

Impact of 204 on remaining programs. In general, the program deliverers indicated that the use of 204 funds has had little or insignificant impact on their remaining program offerings. From the comments of the respondents, it is apparent that the use of 204 funds has had minimal impact on the scheduling, staffing, and use of facilities by the program contractor. While the use of equipment purchased with 204 funds has been extended to all students in the program, interface with programs not receiving 204 funds has not occurred. The majority of the service providers continue to use 204 funds for keeping students in school by providing viable vocational training options.

Knowledge of 204 funded programs. When asked where they had learned about the Section 204 programs, contractors replied that their source of information had usually been the local prime sponsor. A few individuals reported that long-standing relationships or previous participation in MDTA or Title I, Section 112 programs had given them knowledge and insights about supplemental vocational education assistance.

The majority of individuals surveyed reported that their local prime sponsor had been most instrumental in initiating the first contact for the purpose of developing the non-financial agreement for 1981. However, local education agencies were also reported as having played a significant part in making initial contacts for developing current non-financial agreements.

The primary responsibility for the development of the NFA appears to have been shared between the local prime sponsors and the local education agencies. Representatives of both groups were reported as having had joint responsibility in developing the cooperative agreement.

Perceived problems with Section 204 programs. Numerous problems and concerns affecting the success of Section 204 programs were identified. In general, the problems focused on the following topics: (1) planning for 204 programs; (2) student recruitment and accountability systems; (3) administrative concerns; (4) coordination and cooperative relationships; and (5) funding of 204 programs. A few brief comments by the institutional representatives surveyed are summarized below.

Suggestions for improving the use of 204 funds. First, with respect to planning for the use of 204 funds, it was suggested that there seems to be an inability to plan for the most effective use of 204 funds due

to differences in institutional goals, fiscal cycles, and funding patterns. In addition, restrictions on the use of 204 funds and limitations on the length of training to be provided also inhibit effective planning. Finally, the lack of sufficient technical assistance together with the absence of valid and reliable employment and labor market information impedes the planning process.

Second, noting serious discipline problems and educational handicaps, program deliverers felt that there should be better screening of CETA clients. By developing a more adequate screening and intake system to handle the placement of CETA participants, individuals could be better served; without such a system, programs will be unlikely to achieve the desired level of success that is anticipated.

Third, it was suggested that the forms preparation and reporting required of NFA participants was excessive. Individuals felt that the effort required to qualify for the "small amount" of available funds had become an administrative burden; it was hoped that modifications in the system might partially alleviate this problem.

Fourth, there was the expectation among the program/service deliverers that the cooperative relationships and coordination of 204 activities could be improved. It was noted that roles, responsibilities, and relationships between LEAs, Prime Sponsors, TDCA, and TEA need to be further strengthened and more clearly defined. Also, there were suggestions that the authority for policy making be more clearly defined.

Fifth, problems related to delays in funding and reimbursement procedures need to be closely examined; program deliverers felt that every

effort should be made to reduce the delays in order to expedite the provision of services to CETA clients. Also, concerns were raised about the fiscal and accounting procedures.

Survey of Potential Program/Service Deliverers

This part of the information gathered was conducted to identify the reason(s) why various education institutions throughout Texas did not participate in activities funded under Section 204. Furthermore, interviews were conducted to determine if vocational administrators were even aware of the supplemental vocational assistance available. Persons who were contacted via telephone interviews included individuals who were directors of vocational programs with (1) the public, secondary schools of Texas, and (2) the public, postsecondary institutions of the State. They represented the vocational education leadership in those educational agencies which did not participate as service deliverers in any NFA agreements developed in FY 1981. These groups were selected to be interviewed because they represented the type and size of educational institutions which were likely to have both the programs and the services necessary to meet the needs of individual CETA clients. There were 129 secondary vocational directors and 22 postsecondary vocational administrators contacted for this input.

An analysis of their responses to the interview questions indicate that a large number (approximately 75%) of the secondary vocational directors interviewed were uninformed and were interested in receiving additional information about the supplemental vocational education

assistance available through Section 204. Those who were not interested in receiving further information about 204 funded activities cited several reasons.* In general, these directors felt that the CETA programs were "shaky;" requirements (eligibility, paperwork, and "strings") were too stringent or situationally specific, and that the welfare image was antithetical to local administration policy. The directors also noted that there were logistical problems--their schools were too distant from a CETA-eligible population, or that another nearby educational institution was involved in the CETA program. Still others cited a general disinterest because they were "comfortable not knowing about CETA" or they were "getting along just fine without it."

Those secondary directors who were aware of the supplemental vocational education assistance but chose not to be involved in the activities also had reasons for their non-participation. They indicated that they did not feel there were enough CETA-eligible clients within their immediate region; that their school administration had philosophical differences with the concepts underlying the CETA programs, or federal programs in general; and/or that no real need for involvement in the programs had been identified.

At the postsecondary level, a large percentage (43%) of the vocational administrators were aware of the 204 programs; conversely, over half of the persons interviewed did not know about the program. Those who were aware of Section 204 funding gave reasons similar to those of the secondary directors for not participating in the 204 funded activities. However, in several instances, it was noted that 204 programs

*It should be noted that this groups was very small in relation to the entire group of potential service providers; it was comprised of 23 individuals.

were already operating within nearby institutions and the postsecondary vocational administrator did not see any particular reason to become involved. In addition, the postsecondary directors who chose not to participate cited funding limits, county politics, requirements for TEA approval, and the diversion of these funds to secondary, independent school districts as reasons for not being involved.

PART VI: NATIONAL SURVEY OF STATE 204 VOCATIONAL PROGRAMS

This part of the report contains information on Section 204 supplemental vocational education programs obtained from 36 states responding to a telephone interview. Individuals responding to the survey included CETA-state personnel, CETA-Vocational Education coordinators, Governor's Special Grant personnel, CETA-state planners, Employment and Training Personnel, and Balance-of-State staff. The states surveyed are representative of the urban-rural settings throughout the four geographical areas of the 48 contiguous states of the country. The number of prime sponsors in the various states which were surveyed ranged from one in the small states to 40 prime sponsors in the state of California.

Distribution and Allocation of 204 Funds

In distributing and allocating fiscal resources, funds were generally subdivided into program administration and coordination funds, and funds for providing vocational education programs and services to program participants. Regulations related to the use of 204 funds state that not less than 85 percent of the monies available shall be used for providing vocational education programs and services; the remaining 15 percent is to be used for program administration and coordination. A summary of the information obtained from the respondents indicated that the range of monies set aside for administrative costs varies from zero to 20 percent across states. The percent of 204 monies spent for providing vocational training ranged from 80 to 92 percent.

In general, states responding to the survey limit the distribution of 204 funds to the following four categorical cost areas:

- Administration
- Training
- Allowances
- Services

The majority of the states surveyed reported using approximately 100 percent of their 204 funds for vocational training; the percent of 204 funds used by states for providing Basic Skills Training is relatively small. In some states, Basic Skills training is provided to CETA 204 participants through one percent linkage funds or other grants beside the six percent vocational education funds.

A small number of states offer academic credit to CETA 204 participants. A few states indicated that at the present they did not award academic credit but that they were moving in this direction. A greater number of states were found to provide certificates to CETA 204 participants, usually in the vocational programs requiring state level certification.

The percent of 204 funds used by states to provide services to CETA clients varied from zero to 22 percent. The amount of state 204 funds used for payment of allowances to CETA participants ranged from zero to 10 percent, with few states providing allowances to individuals with these monies. In general, the services provided to CETA participants under the 204 programs included, but are not limited to:

- Vocational and Career Counseling
- Vocational Assessment
- Job Survival Skills

- Employability Skills Training
- Transportation Services
- Medical and Dental Services, as needed
- Job Development/Job Placement Services

Allocation of 204 funds by the states followed Department of Labor rules and regulations and Title II, B-C formulas focusing on unemployment/poverty criteria. However, one unique allocation process was identified; it consisted of four weighted criteria: (1) allocations based on Title II, B-C formulas using unemployment/poverty level criteria, (2) a five percent set-aside incentive allocation awarded to prime sponsors based on planned versus actual performance using objective measures focusing on enrollments and spending levels, (3) a special projects allocation at the local level based on individually identified projects, and (4) a "carry-over" allocation limited to a 10 percent amount of the actual 204 funds used during the previous year.

Types and Levels of Educational Programs Using 204 Funds

There was a great variety of public and private vocational education and training institutions, at both the secondary and postsecondary levels, involved in the 204 supplemental vocational education programs. The various educational agencies and institutions involved in the 204 programs across the various states surveyed included, but were not limited to:

- State Area Vocational-Technical Schools and Centers
- CETA Skill Centers
- Junior and Community Colleges
- State Universities

- Private Postsecondary Training Schools and Institutions
- State Postsecondary Correctional Institutions
- Special Schools for Training Persons in Industry
- Community-Based Organizations and Agencies
- Public Secondary Institutions and Unified School Districts

The preponderance of the data gathered indicates great emphasis placed on linking with public, postsecondary institutions to provide vocational training and services to CETA 204 participants.

The Scheduling Patterns of 204 Programs

The scheduling patterns of the 204 programs reported by the states included in this survey were varied and consisted of a mixture or combination of arrangements. The majority of the states surveyed reported having an open-entry/open-exit system for the 204 programs. In particular, proprietary vocational training institutions and CETA skill centers appeared to subscribe to the open-entry/open-exit concept.

Community colleges were generally reported as operating vocational programs on a fixed-time basis, usually on the quarter or semester basis. A total of eight states reported subscribing to the individual referral and less-than-class-size concept. Some states indicated that they had individualized and modularized open-entry/open-exit systems which permitted CETA students to enter and progress in the 204 vocational programs at their own pace.

Monitoring/Assessment of 204 Programs

Respondents to the survey reported that the primary purposes for the assessment of the 204 programs in their state focused on (1) compliance

with contractual agreements, and (2) program improvement. The monitoring was reported as being jointly conducted by an Independent Monitoring Unit (IMU), State Vocational Education personnel, and CETA prime sponsor staff. Eight out of 36 states contacted reported having conducted recent studies of their 204 programs, while 13 states reported that no recent study had been conducted.

A small number of states reported scheduling joint visits to sites providing 204 programs as part of their monitoring activities. In other states, vocational contractors or service deliverers were required to conduct self-evaluations. A few states reported monitoring quarterly reports and non-financial agreements using the following criteria: placement rate, dropout rates, program planning, program implementation, program support, and program results. Regional or field representatives and consultants were reported to be involved in the monitoring of 204 funded programs.

Significant Aspects of the 204 Programs

The majority of the 36 states surveyed reported few innovative uses of their 204 funds. In general, the states utilize 204 monies for increased linkages or an extension of Title II, B programs. However, several states reported unique uses of 204 funds which included the following:

- Providing CETA 204 participants with assessment services in order to more appropriately match individual interests to the vocational training programs selected.
- Providing opportunities to test linkages through specific demonstration projects.
- Providing linkage programs and services for displaced homemakers.

- Providing entry-level vocational training programs to individuals in correctional institutions.
- Providing access to community/junior colleges and universities for mainstreaming economically and academically disadvantaged individuals.
- Providing pre-nursing programs, day care centers, paraprofessional training programs in the health care occupations, and programs for rural youth entering into nontraditional careers.

In summary, it is apparent that the maximum benefit derived from Section 204 funds is the ability to provide targeted programs and services to CETA eligible participants who would not otherwise be served. Additionally, the funding enables individuals to develop greater occupational awareness and employability skills needed for successful employment.

Comments and Recommendations of Other States Regarding Section 204

The following are general comments regarding problems, concerns, perceived barriers, and recommendations relative to 204 vocational training programs made by CETA supervisors and individuals within the Governor's Special Grants Office.

Funding.

- The flow of 204 funds through the Governor's Office results in excessive administrative burden and costs, additional paperwork, and delays in the "start-up" of 204 vocational training programs.
- Many individuals feel that 204 funds should be given directly to prime sponsors and local educational institutions.
- The lack of forward funding and the complexity of the funding process are perceived barriers to successful program operation.

Administration.

- In some cases, there is great concern on the part of many individuals over the tremendous control and authority assumed by the Governor's office.

- There is a need to delineate and clarify areas of responsibility and authority between the Governor's Special Grant Office, the State Vocational Education Agency and Local Prime Sponsor staff.

Program planning.

- Planning for the use of 204 funds is difficult because of the low priority given to such programs and because the state and federal fiscal cycles are not in synchronization.

- There is a lack of adequate lead time given for planning for the use of 204 funds.

- Adequate planning for 204 programs cannot be accomplished due to the restricted use of funds and the lack of involvement of local prime sponsors in the planning process.

Coordination between CETA prime sponsors and state boards of vocational education.

- Some prime sponsors fail to adequately coordinate with state vocational education personnel with respect to needed programs and services to be provided.

- Inconsistencies of definitions and reporting systems between CETA and vocational education, coupled with lack of adequate technical assistance, accountability, and monitoring systems, inhibit coordination and planning efforts.

PART VII: CONCLUSIONS AND RECOMMENDATIONS

The staff of the Education-for-Work Linkage Project has carefully reviewed the Legislative Provisions for Title II, Part A, Section 204 of the CETA Amendments of 1978. Staff members have reviewed the procedures for administering this part of CETA in Texas, reviewed how other States have used this allocation, gathered information from state and local personnel experienced with Section 204, and reviewed previous research conducted in relation to this section of CETA. The following conclusions and recommendations are offered.

Legislative Provisions

The potential for utilizing Section 204 funds to increase the capacity of a state to provide vocational education services to citizens has not been fully realized in many states; indeed, this potential requires re-examining and re-thinking in Texas. This part of the CETA Amendments of 1978 offers unexplored opportunities that should not be taken lightly, nor administered routinely. Section 204 funds afford the State of Texas an opportunity to engage in innovative and creative activities that the State possibly could not realize otherwise, given the present economic situation, particularly with upcoming budget cuts in both the federal vocational education and CETA allocations.

Section 204 offers the State an opportunity to plan beyond the boundaries of CETA prime sponsor regions (e.g., on a state-wide basis). The funds could also be used to offer demonstration training efforts to special populations, in remote parts of the State, that normally do not have access

to vocational training. Or these resources could provide the opportunity to create training in high-demand occupations that would be accessible to CETA clients throughout the State.

This section of the CETA enactment is designed for creativity and innovation. Thus, Supplemental Vocational Education Assistance was not necessarily meant to be viewed, or administered, as merely one more CETA program that comes under the same procedures normally followed at the prime sponsor level. Even though the CETA prime sponsors in Texas are notified of an allotment under Section 204, this does not necessarily mean that each of these allotments must be spent within the boundaries of the prime sponsor regions. The allocations could be used to sponsor the CETA-eligible clients for high-demand occupational training anywhere in the state where such training is offered.

Through the legislative provisions, optional uses may be identified for Section 204 funds. Through the option of using only 85 percent of the funds for participant training, and up to 15 percent for support services--curriculum development, technical assistance, etc., an opportunity exists to provide lasting and ongoing impact on the vocational education delivery system in order to assist the system to better serve the typical CETA client.

Recommendation #1: A Task Force should be assembled by TDCA to address the policy questions specific to alternative approaches for the use of Section 204 funds. Such a task force should be comprised of both state and local-level CETA and vocational education policy-makers and administrators.

Recommendation #2: Such a Task Force should identify the ways in which the vocational education delivery system needs strengthening to accommodate the CETA-eligible client.

Recommendation #3: TDCA should exercise the option to use 15 percent of the Section 204 funds and either directly, or through the sub-contracts, provide technical assistance, regional coordination, curriculum development, and/or regional planning activities to support the implementation of Section 204.

Planning for Use of Section 204 Funds

Congressional members in 1978 made assumptions about the capability of the vocational education delivery systems in the various states. When enacting the CETA Amendments of 1978, they assumed that the Vocational Education Amendments of 1976, with all the emphasis on planning, had successfully established mechanisms within the states to facilitate and foster state-wide planning for vocational education. Such planning mechanisms, at the very least, should have identified high demand training needed by the state, organized labor market demand information, catalogued resources and identified training gaps in vocational services by state planning regions.

The full potential of the Vocational Education Amendments has not yet been achieved in Texas, and the lack of such a planning mechanism weakens the capacity of the State to accommodate and take advantage of Section 204 of the CETA amendments.

Recommendation #4: The Texas Education Agency, Division of Occupational and Technical Education, should review the planning mechanisms in place for vocational education in order to identify gaps in vocational education services on a regional basis. The range of occupational offerings, range of services provided (i.e.,

counseling, cooperative programs versus classroom instruction), and kinds of curriculum available should be identified. The availability of open-entry/open-exit instruction on a regional basis should be studied.

In addition to assumptions regarding state-wide planning, Congressional members provided an opportunity for the council which advises on the formulation of the State Plan for Vocational Education--under provisions of Section 107(a)(1) of the VEA of 1963--to have involvement and advise on the use of the Section 204 funds. Assumptions were made that this group, in particular, had a grasp of state-wide needs in vocational education.

Recommendation #5: The Texas Education Agency should seek advice concerning the best use of Section 204 funds from the planning council which assists in formulating the State Plan for Vocational Education. This should be done prior to the formulation of non-financial agreements on the part of prime sponsors, not after the fact. This group should be involved in planning for the use of these funds, not merely reviewing plans after they are made.

Recommendation #6: TDCA should consider establishing an allocation formula for the distribution of Section 204 funds based on incentives for past performance.

Communicating the Opportunities of Section 204

There is an obvious lack of understanding in Texas, among local vocational administrators and CETA prime sponsor staff, regarding the purposes and opportunities inherent in Section 204 of CETA. Many potential deliverers of services are not aware of these funds; others have ambiguous feelings about how the funds are to be used. Brochures, communiques, or workshops could be used to communicate the opportunities available and help in planning for the use of Section 204 funds.

Recommendation #7: Prime sponsors should make sure all potential contractors in their regions are aware of the Section 204 funds; the Texas Education Agency should make sure school superintendents and local vocational directors are aware of the uses for these funds. Brochures jointly prepared by TDCA and TEA could explain and advertise the innovative uses of Section 204 resources.

Attitudes Concerning Section 204

During the assessment, obvious negative feelings about "too many agencies involved" were noted by the respondents to the surveys. Attitudes seem to imply that multi-agency coordination was an unwieldy, burdensome exercise which created stumbling blocks rather than greater effectiveness in administering the use of the Section 204 funds.

This attitude needs to be examined by both Prime Sponsor staff members and local vocational administrators. The use of Section 204 funds should be viewed as the one demonstration effort available within the State to gather and capitalize on the resources and other potential benefits to be derived from multi-agency involvement. Section 204 provides the state an opportunity to build networks, strengthen communications, and foster regional planning through its multi-agency involvement.

Recommendation #8: An annual report indicating what has been done with Section 204 funds to enrich the vocational education system in Texas and meet the needs of CETA clients in unique ways should be prepared. This report should be sponsored and completed by TDCA, with the involvement of TEA and prime sponsors.

REFERENCES

Colmen, J. and Wurzburg, G. Involving Schools in Employment and Training Programs for Youth. Washington, D. C.: National Council on Employment Policy (DOL), 1979.

Conserva, Inc. Case Studies of Vocational Education - CETA Coordination: Vol. I. Raleigh, N. C.: Conserva, Inc., 1980.

_____. Mechanisms for Vocational Education - CETA Coordination: Vol. II. Raleigh, N. C.: Conserva, Inc., 1980.

_____. The Context of Vocational Education - CETA Coordination: Vol. III. Raleigh, N. C.: Conserva, Inc., 1980.

Davidson, R. The Politics of Comprehensive Manpower Legislation. The Johns Hopkins University Press, 1972.

Horan, M. D. A Preliminary Report on State-Level CETA Vocational Education Coordination in Texas. Michigan Proaction Institute, 1978.

Lamar, C. and Owens, D. A Study of CETA/Vocational Education Coordination, Cooperation, and Collaboration in Kentucky. Lexington, KY: University of Kentucky, Department of Vocational Education, 1980.

Middle Cities Education Association. A Project to Describe and Evaluate the Impact of the 1976 VEAs Upon CETA-Post-Secondary Vocational Programs and Organizational Linkages. Lansing, Mich.: Middle Cities Education Association, 1979.

National Association of State Boards of Education. CETA-Education Collaboration Issues in Three States: Vol. I. Washington, D. C.: National Association of State Boards of Education, 1979.

_____. Educational Governance and Youth Employment Issues: Vol. II. Washington, D. C.: National Association of State Boards of Education, 1979.

Rist, R., Gillespie, G., Hamilton, M., Holloway, W., Johnson, S., and Weltberger, H. Forging New Relationships: The CETA/School Nexus. Ithaca, NY: Cornell University, Youthwork National Policy Study, 1979.

Rogers, C. and Schafferli, M. Fiscal Year 1979 Overview of the State Departments of Vocational Education Involvement in CETA. Washington, D. C.: U. S. Department of Education, Office of Vocational and Adult Education, CETA Coordination Unit, October 1980.

Sultan, P. CETA Linkages in Illinois. Edwardsville, IL: Southern Illinois University, 1979.

Texas Education Agency. A Procedure Guide for Utilization of Title I, Section 112 Funds. Austin, TX: Texas Education Agency, 1977 (Revised).

United States Conference of Mayors, CETA-Vocational Education Coordination: Highlights of Selected Studies. Washington, D. C.: U. S. Conference of Mayors, 1981.

Wilken, W. and Brown III, L. Manpower-Education Coordination: Two Decades of Frustration, Washington, D. C.: U. S. Department of Education, Office of Technical and Analytic Systems, Office of Planning and Budget, 1981.

Wisconsin Research Coordinating Unit. Cooperation Between Vocational Education and CETA. Madison, Wisconsin: Wisconsin Board of Vocational, Technical and Adult Education, 1979.

93rd Congress. Public Law 93-203: Comprehensive Employment and Training Act of 1973. Washington, D. C.: Government Printing Office, December 1973.

95th Congress. Comprehensive Employment and Training Act Amendments of 1978. Washington, D. C.: Government Printing Office, October 1978.

APPENDIX A

Comprehensive Employment and Training Act Amendments of 1978
P. L. 95-524

"SUPPLEMENTAL VOCATIONAL EDUCATION ASSISTANCE

"Sec. 204. (a) (1) From the funds available to him for this section, the Secretary shall make grants to Governors to provide financial assistance, through State vocational education boards, to provide needed vocational education services in areas served by prime sponsors, in accordance with an agreement between the State vocational education board and the prime sponsor.

"(2) The State vocational education board, prior to making any agreement with a prime sponsor as provided in paragraph (1), shall consult with and obtain the advice and comment of the designated representatives of the State agencies and councils which are required to be involved in the formulation of the five-year State plan for vocational edcuation pursuant to section 107 (a) (1) of the Vocational Education Act of 1963.

"(b) All of the sums available to carry out this section shall be allocated among the States in the manner provided for allocating funds under section 202(a).

"(c) (1) Not less than 85 percent of the funds available under this section shall be used only for providing vocational education and services to participants in programs under this Act.

"(2) The remainder of the funds available under this section may be used—

"(A) to coordinate programs under this Act with existing vocational education programs;

"(B) to coordinate the utilization of funds under this Act and the Vocational Education Act of 1963 to enhance economic growth and development in the State;

"(C) to develop linkages between vocational education, education, and training programs under this Act and private sector employers;

"(D) to provide technical assistance to vocational education institutions and local education agencies to aid them in making cooperative arrangements with appropriate prime sponsors;

"(E) to provide information, curriculum materials, and technical assistance in curriculum development and staff development to prime sponsors.